

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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J.K.J.,

Plaintiff,

Civil Action No. 15-cv-428-wmc

v.

POLK COUNTY SHERIFF'S DEPARTMENT  
and DARRYL L. CHRISTENSEN,

Defendants.

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**PLAINTIFF'S ANSWER TO INTERVENOR WISCONSIN COUNTY MUTUAL  
INSURANCE CORPORATION'S COMPLAINT FOR DECLARATORY JUDGMENT**

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Plaintiff, through her attorneys, Eckberg Lammers, Briggs, Wolff & Vierling, PLLP answer Intervenor Wisconsin County Mutual Insurance Corporation's (WCMIC) Complaint for Declaratory Judgment as follows:

1. Plaintiff denies each and every paragraph, matter and allegation contained in Intervenor WCMIC's Complaint for Declaratory Judgment, except as hereinafter qualified, admitted, or explained.
2. Upon information and belief, Plaintiff admits the allegations contained in Paragraphs 1, 2, 3, and 5 of Intervenor WCMIC's Complaint.
3. As to Paragraph 4, Plaintiff states that no response is required of it, except to state that Defendant Polk County's answer and affirmative defenses, Defendant Christensen's answer and affirmative defenses, and WCMIC's allegation that their insurance coverage does not apply are wholly meritless.
4. As to Paragraph 6, Plaintiff is without knowledge as to conversations had between the Polk County Sheriff's Department, Darryl L. Christensen, and WCMIC. Plaintiff admits

and agrees that there is insurance available through WCMIC for the claims made by Plaintiff against Defendants.

5. Plaintiff denies the allegations contained in Paragraphs 7 and 8 and puts Intervenor WCMIC to its strictest proof thereof.
6. As to the allegations contained in Paragraphs 9 and 10, the allegations state legal conclusions which require no present response; to the extent that one is required, Plaintiff denies the allegations.
7. As to the allegations contained in “Wherefore” clauses of Intervenor WCMIC’s Complaint, Plaintiff states that no response is required, but to the extent a response is required, Plaintiff denies each and every allegation therein and puts Intervenor WCMIC to its strictest proof thereof.

**ECKBERG, LAMMERS, BRIGGS,  
WOLFF & VIERLING, PLLP**

Dated: 11/23/15

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